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One Pennsylvania Plaza, Suite 2434, New York, NY 10119 v 212.244.8438 f 212.244.8439

May 17, 2000

The Honorable Harold Furchtgott-Roth  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RECEIVED  
MAY 17 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: DTV Readiness (MM Docket No. 00-39)

Dear Commissioner Furchtgott-Roth:

As an emerging data broadcasting service provider, Wavexpress shares the concern of many others in the broadcast industry that the standards adopted for use of the Digital Television spectrum ensure the proliferation of this new medium. In particular we are concerned that the modulation schemes available to U.S. broadcasters support the broadest range of consumer services.

We believe that the convergence of DTV and the Internet can revolutionize the way consumers will relate to their televisions and PC's in the future, bringing enhanced public services, interactive entertainment, and new e-commerce models directly to all of us in our homes. However, for this to occur, widespread use of the DTV spectrum must also occur, and for ubiquitous use of the DTV spectrum to emerge, the standards must address the broadest possible market base.

In this regard, it is important to note that new technologies and infrastructures are initialized and driven only by useful applications (witness spreadsheet and word processing applications for the PC and wireless pager and cell phone applications). Our company has developed a software application that enables broadcasters to realize the potential of the DTV bandwidth by delivering a rich, multi-media experience to their viewers' PC's or Digital Televisions. This secure, e-commerce based application has the potential to be an important lever for the convergence of these industries, and greatly accelerate the deployment of DTV in the United States. While we will work to achieve this, the degree of our success is subject to the underpinnings of the accepted standard.

In the debate over the modulation schemes (8VSB vs. COFDM) for the DTV standard we stand agnostic, as our service is not technically dependent on modulation. However, in order to have a successful service (application) it is important that the audience reach not be reduced by the need for large, directional antennas or special mounting, through poor signal quality in densely populated urban areas, or by limited acceptability in important, growing markets (e.g. portable applications). Any standard that compromises ease of use or places limits on the range of applications also places limits on the size of the addressable market. Naturally, limited markets meet with limited success. In order for DTV to succeed we believe the standards supporting DTV use in this country must have zero tolerance for such compromises.

We simply want DTV and its associated technologies and services to have the best chance at survival, for the sake of all. In this light, we ask you to please help us ensure that this happens.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Campelia".

Bruce Campelia  
EVP, Wavexpress, Inc.

Cc: Dale Hatfield, Chief, OET

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One Pennsylvania Plaza, Suite 2434, New York, NY 10119 v 212.244.8438 f 212.244.8439

May 17, 2000

The Honorable Michael Powell  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
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One Pennsylvania Plaza, Suite 1434, New York, NY 10119 v 212.244.8438 f 212.244.8439

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May 17, 2000

The Honorable William Kennard  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: DTV Readiness (MM Docket No. 00-39)

Dear Commissioner Kennard:

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The Honorable Gloria Tristani  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: DTV Readiness (MM Docket No. 00-39)

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 17, 2000

The Honorable Susan Ness  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: DTV Readiness (MM Docket No. 00-39)

Dear Commissioner Ness:

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*Bruce Campelia*

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